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May 29, 2019

BY ECF ONLY

Hon. Vernon S. Broderick, U.S.D.J.
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, New York 10007

RE: *Trustees of the New York City District Council of Carpenters Pension Fund, et al.*
v. Elite Union Installations, LLC, et ano.
Civil Action No. 19-CV-1090

Your Honor:

I represent Defendant Office Solution Group, LLC in the above-referenced matter and submit this letter-motion to request an extension of time until June 28, 2019 for the Defendants to respond to the Complaint. Plaintiff consents to this extension request.

The current due date for a response to the Complaint is May 31, 2019, as follows: Plaintiff filed affidavits of service indicating that Defendants had been served on February 6, 2019 (Documents 6, 7). Thereafter, on May 7, 2019, I requested an extension of time until May 31, 2019 for Defendants to respond to the Complaint, which this Court granted. The reason for the first extension request was for additional time for the parties to continue settlement discussions. .

The parties have had settlement discussions and my client has produced information to the Plaintiff in an effort to resolve this matter. Plaintiff recently requested some additional documents, which my client has agreed to produce. The reason for this extension request is for sufficient time for my client to retrieve the requested documents (some of which are in storage), produce them to Plaintiff, for Plaintiff to have an opportunity to review the additional documents and for the parties to continue discussions to try to resolve this matter by June 28, without the need for further litigation.

Thank you for your consideration of this extension request.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Lawrence J. Sass", written in a cursive style.

Laurence J. Sass